

EXHIBIT 2

IN THE CIRCUIT COURT FOR THE CITY OF SAINT LOUIS
STATE OF MISSOURI

TGP COMMUNICATIONS, et al

Plaintiffs,

v.

MARY FANNING, et al

Defendants.

Case No. 2222-CC00025

**PLAINTIFFS' FIRST REQUESTS FOR
ADMISSIONS DIRECTED TO
DEFENDANTS FANNING AND HOWSE**

***THESE REQUESTS HAVE BEEN
SERVED WITH PLAINTIFFS' PETITION***

**A FAILURE TO TIMELY RESPOND TO
REQUESTS FOR ADMISSIONS IN
COMPLIANCE WITH RULE 59.01
SHALL RESULT IN EACH MATTER
BEING ADMITTED BY YOU AND NOT
SUBJECT TO FURTHER DISPUTE**

COME NOW Plaintiffs by and through their undersigned counsel, and for their First Requests for Admissions Directed to **BOTH** Defendants Mary Fanning and Brannon Howse, state as follows:

INTRODUCTORY NOTE

These Requests have been served contemporaneously with Plaintiff's Petition for damages, and must be answered within sixty (60) days of service.

INSTRUCTIONS

Pursuant to Missouri Rule, you are to admit or deny the following requests. If you deny any of the requests, please state the specific basis for your denial.

Should you claim any privilege to answering any of the following admissions, you are directed to provide an explicit explanation of all privileges claimed, specifically explaining the privilege' applicability.

REQUESTS FOR ADMISSION

REQUEST NO. 1: Admit that your claims of having authentic domestic and international PCAP captures from the November 2020 election night are false.

RESPONSE:

REQUEST NO. 2: Admit that PCAPS and or other file purporting to contain real/actual pocket traffic to and from the various November 2020 election sites as presented by Mike Lindell and Mary Fanning are forgeries and/or fabrications.

RESPONSE:

REQUEST NO. 3: Admit that Dennis Montgomery does not now and did not in the past have Secret or any other type of classified information that pertains to government wiretaps, domestic surveillance data, or classified network traffic intercepts

RESPONSE:

REQUEST NO. 4: Admit that claim and evidence of foreign hacking of the November 2020 election sites as presented by Mike Lindell in the ABSOLUTE PROOF series are fabricated and false.

RESPONSE:

REQUEST NO. 5: Admit that Dennis Montgomery is now and has been a US government informant and or confidential human source.

RESPONSE:

REQUEST NO. 6: Admit that Mike Lindell court fillings regarding his ABSOLUTE PROOF program were based on false information.

RESPONSE:

REQUEST NO. 7: Admit that at the time Mike Lindell made the various claims in his ABSOLUTE PROOF series, the people promoting the November election PCAP data (including but not limited to yourself) knew that it was false.

RESPONSE:

REQUEST NO. 8: Admit that Mary Fanning has no computer forensics, cybersecurity, intelligence collection/analysis expertise.

RESPONSE:

REQUEST NO. 9: Admit that Mary Fanning does not understand IP network monitoring principles and practices.

RESPONSE:

REQUEST NO. 10: Admit that Alan Jones has no computer forensics, cybersecurity, or intelligence collection/analysis expertise.

RESPONSE:

REQUEST NO. 11: Admit that Fanning's ABSOLUTE PROOF series publications and work product were done as work for hire.

RESPONSE:

REQUEST NO. 12: Admit that the identity theft of Mary Fanning Penny (see the attached affidavit) and the creation of her on-line profile on the HIVE platform (see attached profile) with information tying her to the Absolute Proof and TheAmericanReport.org were used to hide the true identity of *Mary Fanning Kirchhoefer*, the actual author of "THE HAMMER is the Key to the Coup "The Political Crime of the Century": How Obama, Brennan, Clapper, and the CIA spied on President Trump, General Flynn ... and everyone else."

RESPONSE:

REQUEST NO. 13: Admit that Dennis Montgomery's claim of leaking USG (NSA and CIA) usage of the HAMMER AND SCORECARD computer/software and having past or present access to the source code, operational data (such as credit card data, PII, SS numbers, phone number, etc.), design documents, Concept of Operations, and/or data intercepts for such system are false.

RESPONSE:

REQUEST NO. 14: Admit that Dennis Montgomery did not develop a computer and software system capable of interception and decrypting privileged private traffic over the internet.

RESPONSE:

REQUEST NO. 15: Admit that Dennis Montgomery did not decrypt any network traffic involved in the November 2020 election sites.

RESPONSE:

REQUEST NO. 16: Admit that Dennis Montgomery does not now and did not at any point have any actual PCAPS of the November 2020 election data.

RESPONSE:

REQUEST NO. 17: Admit that Dennis Montgomery fabricated the network records showing PCAPS from foreign locations to the November 2020 US elections sites.

RESPONSE:

REQUEST NO. 18: Admit that Dennis Montgomery never worked for the NSA as an employee or contractor or was ever affiliated with any NSA program.

RESPONSE:

REQUEST NO. 19: Admit that Dennis Montgomery has been convicted of fraud.


RESPONSE:

REQUEST NO. 20: Admit that Dennis Montgomery published his PCAP claims on his Blxware.org website he was aware that the information he was promoting was fraudulent.

RESPONSE:

Respectfully Submitted,

/s/ John C. Burns

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*Attorneys for Yaacov Apelbaum, XRVision Ltd.,
Joseph Hoft, and TGP Communications, LLC*

¹ Pro hac vice pending.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided to a special process server, along with the Petition in this matter, for personal service upon Defendants Howse and Fanning.

/s/ John C. Burns

John C. Burns